

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

**JOINT STIPULATION REGARDING MODIFICATION OF THE SCHEDULING
AND CASE MANAGEMENT ORDER**

The parties in the above-captioned matter hereby jointly stipulate to the following modification of the Scheduling and Case Management Order (“Scheduling Order”) as follows:

WHEREAS:

Under the Scheduling Order issued by the Court on October 16, 2019 (Dkt. 197),¹ the substantial completion deadline for the production of documents was March 2, 2020, with the parties permitted to “agree to additional production following the deadline,” and the deadline to produce all privilege logs was April 15, 2020;

The Court previously ordered that the deadlines for completion of the substantial production of documents and for production of all privilege logs be extended to July 1, 2020, and August 1, 2020, respectively (Dkt. 233);

¹ Docket entries refer to those in *Craig v. CenturyLink, Inc.*, No. 18-cv-296.

The parties have agreed to hold the August 7, 2020 deadline for the disclosure of the identity of experts in abeyance, pending agreement between the parties on a proposed revised schedule and the Court's approval thereof;

Ongoing global events related to the spread of COVID-19 continue to cause disruption and uncertainty for the parties in this matter; and

All parties believe it is in the best interests of the Court and the parties that the Scheduling Order be modified in light of these events, such that the deadlines contained therein be extended consistent with the Court's order extending the deadlines for the substantial completion of documents and production of privilege logs;

THEREFORE:

1. The parties stipulate to a modification of the Scheduling Order as reflected in the attached Appendix A.

Dated: August 25, 2020

Respectfully submitted,

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Appendix A

<u>Event</u>	<u>Current</u>	<u>Proposed</u>
Identity of Experts Disclosed	August 7, 2020	Friday, November 13, 2020
Additional Experts Disclosed	August 28, 2020	Friday, December 4, 2020
Fact Discovery Cutoff*	September 21, 2020	Wednesday, February 3, 2021
Non-dispositive Motions	September 28, 2020	Wednesday, February 10, 2021
Expert Reports	October 13, 2020	Thursday, February 25, 2021
Identity of Rebuttal Disclosed and Expert Rebuttal Reports	November 13, 2020	Monday, March 29, 2020
Completion of Expert Depositions/End of All Discovery	December 2, 2020	Friday, April 16, 2021
Non-dispositive Motions re. Expert Discovery	December 9, 2020	Friday, April 23, 2021
Submit Proposed Summary Judgment Briefing Schedule	December 1, 2020	Thursday, April 15, 2021
Summary Judgment Motions	December 21, 2020	Wednesday, May 5, 2021

*Due to continued uncertainty regarding the COVID-19 outbreak, the parties have agreed to proceed with depositions of fact witnesses remotely. Defendants reserve the right to revisit this issue as circumstances develop, and to maintain that certain depositions, including depositions of the Individual Defendants and other current and/or former senior officers, directors or employees of CenturyLink, should occur in person.